

Appendix E
Permittee Review Comments of SAR DAMP



*Executive Office
County of Riverside*

*Larry Parrish
County Executive Officer*

May 5, 2000

Mark Wills, P.E.
Riverside County Flood Control and Water Conservation District
1995 Market Street
Riverside, CA 92501

RE: Santa Ana NPDES Municipal Stormwater Permit Renewal

Dear Mark

This letter responds to the NPDES Permit Renewal request letter dated April 19, 2000. Generally, the County concurs with the current structural program arrangements and implementation processes. However, the following comments/suggestions are submitted for consideration for inclusion in the drafting of the new permit.

Documents such as the SAR DAMP should be formatted to include and index for quick reference. Since it is likely this document will grow, its use, as a development tool should be made as simple and clear as possible. Also, it should include a glossary for those persons who are unversed in the language of water science and storm water management.

The County presently views the current program structure and management as sufficient for the purpose of interfacing with the Regional Water Quality Control Board and Co-permittees. It appears that the present structure is well received by the Regional Water Quality Control Board and beneficial to all participants.

It appears that the current BMP program is working to the benefit of all participants. This effect should be sought in the new permit even though there are likely to be new requirements that may necessitate retooling some of the municipal land use planning and development review processes. New requirements will also create a profound need for the County to seek new and sufficient funding. The MEP should include consideration of a municipality's ability to fund new BMP requirements.

Requests should be made to the State for it to increase its participation in the training of local municipal staff and the private development community. A regularized statewide training program should be developed to operate on a cyclical basis.

Santa Ana NPDES Municipal Stormwater Permit Renewal
Thursday, May 04, 2000
Page 2

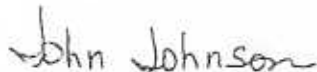
Currently the storm water monitoring program appears aloof. A program of regular reporting of findings, results and implications of the monitoring program should be presented to the co-permittee periodically. Monitoring should continue to be conducted as one of the tools for developing good storm water science for local areas within Riverside County. Also, the applicant should recommend a monitoring program tailored to the local area, not utilize a version of an East Coast model.

Generally the architectural structure of the annual report is sufficient and workable. However, each Co-permittee should not be asked to submit reports under an individual agency letter. This process appears to be positioned as a disclaimer, which presents a somewhat negative connotation.

Finally, understanding that there is a balance to be struck between the Co-permittees and the Regional Boards, and effort should be made not to include extreme new BMPs or other requirements based on a perception that the Regional Board will require them. For example, if the decision is made to include a requirement such as numeric sizing, the draft should include criteria set by the applicants and not by the Board.

If you have questions, contact me at 909.955.1114.

Respectfully yours,



JOHN JOHNSON
Administrative Manager



City of Beaumont

550 East Sixth Street
Beaumont, CA 92223
(909) 769-8520
FAX (909) 769-8525
FAX (909) 769-8526

RECEIVED
MAY - 2 2000

April 28, 2000

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

Mr. Mark Wills
Riverside County Flood Control and Water Conservation District
1995 Market Street
Riverside, CA 92501

Dear Mr. Wills:

Re: Santa Ana NPDES Municipal Storm water Permit Renewal-Your letter dated April 19, 2000

In response to your letter we are enclosing a copy of the new Beaumont Drainage Management Plan(BDMP). One copy of this plan has already been submitted to the Regional Water Quality Control Board for their review before providing the document for public review and comment.

The BDMP was developed to provide Best Management Practices(BMP) for a small city such as Beaumont with extremely limited resources but tremendous opportunities for orderly growth and development in the very near future. We have utilized the SAR DAMP BMP format and requirements to develop the BDMP and we are confident that the program will be infinitely suitable for our city and in conformance with your plan as the principal permittee to complete the Report of Waste Discharge(ROWD).

We have decided to further enhance the effectiveness of our program by proposing to include the following:

I. Structural Controls BMP S1

Action S1E Include the use of filters in all catch basins, detention ponds, and Storm water systems, whether existing or proposed, to remove grit and sediment, oil and grease and other contaminants from storm water runoff. These filters will be similar or equal to those provided by manufacturers such as Abtech Industries.

Page 2

April 28, 2000

Santa Ana NPDES Municipal Storm Water Permit

2. Regulatory and Enforcement Activity BMP R1, R2 and R4

Action R1B, R2B, R4B will ensure a modification and strengthening of the present ordinance to include the above activity.

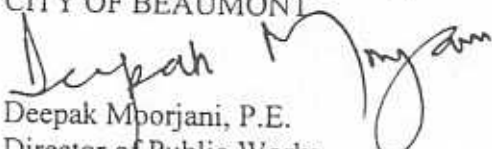
3. Require all new development, by ordinance/resolution to pay a storm water fee that is utilized to ensure monitoring and implementation of the BDMP.
4. Establish a budget to immediately commence the environmental educational activities identified in the BDMP with an additional goal of environmentally educating at least 90% of all storm water related City staff within the next 12 months.
5. Establish an inspection program of all facilities in the City that maintain any hydraulic capacity.
6. Immediately identify all automotive and restaurant facilities in the City and set up an inspection program.
7. Require conformance to the BDMP of all new development in the City.

As requested in your above letter, we are enclosing a copy of the General Plan Map of the City and a current inventory of the City's storm water infrastructure.

Please do not hesitate to call if you need any further information or clarification.

Sincerely

CITY OF BEAUMONT


Deepak Mporjani, P.E.
Director of Public Works

Enclosures

cc: Mr. Alan Kapanicas, City Manager



CITY OF CANYON LAKE

RECEIVED

MAY 08 2000

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

Mark H. Wills
Senior Civil Engineer
Riverside County Flood Control
And Water Conservation District
1995 Market Street
Riverside, CA 92501

Re: FY 1999-2000 Annual ROWD

In response to your request for City of Canyon Lake information which your agency needs to prepare the regional ROWD, I am enclosing:

- A brief narrative highlighting any concerns/suggestions along with a copy of our annual report response which defines the utility of current BMP programs and organization within our City.
- A copy of our annual implementation report/programs.
- A copy of our General Plan map
- No changes in our Facilities Map which is on file with your Agency.

Narrative

Canyon Lake is a gated community with a limited storm water/waste discharge system. We do not have any dumpsites, commercial/industrial concerns of any magnitude. Our community's storm drain system is well marked and because we are a lake oriented community we get a high degree of public awareness and compliance in our storm and waste water discharge programs. Our Code Enforcement officers monitor construction sites and the stormwater collection system. BMP's are made available to contractors as part of our building permit/plan check process. We also hold periodic Household Hazardous Waste collection programs with our neighboring city, Lake Elsinore and work with our trash collection firm and with WRCOG for special cleanup events.

In general, the existing SAR DAMP and BMP programs are working well for Canyon Lake.

Please contact me at 909-244-2955 should you have any questions regarding our response

Sincerely,

Delbert Powers
City Manager

Frank Kessler
Mayor
Eugene Bourbonnais
Mayor Pro Tem
Cora Sue Barrett
Council Member
Thomas Nagle
Council Member
Alfred W. Trembly
Council Member



OFFICE OF: PUBLIC WORKS DEPARTMENT

(909) 736-2248
(909) 736-2496 (FAX)
joei@ci.corona.ca.us

815 WEST SIXTH STREET (P.O. BOX 940), CORONA, CALIFORNIA 91718-0940
CORONA CITY HALL - ONLINE, ALL THE TIME <http://www.ci.corona.ca.us>

May 5, 2000

Mr. Mark Wills
Senior Civil Engineer
Riverside County Flood Control
and Water Conservation District
1995 Market Street
Riverside, CA 92501

RE: SANTA ANA NPDES MUNICIPAL STORM WATER PERMIT
RENEWAL/REAPPLICATION

Enclosed is a package of information requested in the letter to the City Manager dated April 19, 2000, in reference to the subject matter.

The package includes the following:

- ❖ A copy of Municipal Facilities Strategies, dated August 1997
- ❖ A draft copy of Enforcement/Compliance Manual, dated May 1997
- ❖ Copies of internal documents pertinent to overall program implementation

Since the development of the Santa Ana Regional Drainage Area Management Plan (SAR-DAMP) in February 1993, the City of Corona has put together a plan to implement the storm water management under the authority of the NPDES Program.

In 1996, the City Council adopted Ordinance No. 2291 adding Chapter 13.27 to Title 13 of the Corona Municipal Code concerning Storm Water Management and Discharge Controls.

In 1997 two implementation documents were written, one being the Municipal Facilities Strategies, which was approved in August 1997, and the second one was Enforcement/Compliance Manual. The latter is still in its draft format and waiting to be approved concurrently with the area-wide/regional enforcement document.

Upon review of and after implementing the SAR-DAMP for the past several years, the City would like to offer some suggestions as follow:

Format, Clarity & Utility

- ❖ Add reasonable compliance/completion schedule for each sub-program/plan

Program Organization/Management Structure

- ❖ Form an Executive Committee
- ❖ Re-activate the Task Force Sub-committee to complete the Enforcement/Compliance Strategy Document

Area-wide BMP Programs

- ❖ Obtain grants to try different pilot products related to storm water quality management

Monitoring Program

- ❖ Share monitoring data with co-permittees on a regular basis
- ❖ Use watershed basis and involve co-permittees in selecting monitoring locations
- ❖ Utilize video-taping to trace illegal discharges/illicit connection as needed

Annual Reporting Program

- ❖ Utilize performance measure by applying certain standard
- ❖ Form a Task Force Sub-committee to develop standards for performance measure and financial/fiscal analysis reporting

Internal Accountability

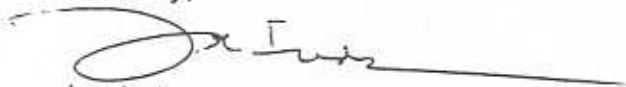
- ❖ Emphasize on meeting attendance
- ❖ Submit quarterly reports on program implementation to Executive Committee

Program Implementation Consistency/Standardization

- ❖ Develop a computerized record keeping for all permittees

Thank you for your leadership in implementing the storm water compliance program.
Should you have any question please call me at 736 2248.

Cordially,



Joe Indrawan
NPDES Program Manager

Enclosures

cc: Ati Eskandari
Ned Ibrahim



FAX Transmission Cover Sheet

DATE: May 8, 2000
TO: Mark Wills, Riverside County Flood Control & Water Conservation District
FAX NO: (909) 788-9965
SUBJECT: Request for Permittee Information
SENDER: Linda Nixon, Public Works Department

YOU SHOULD RECEIVE 5 PAGE(S), INCLUDING THIS COVER SHEET.

Here is our Permittee Information Narrative. I will send the entire packet of information including our Drainage Area Management Plan and Municipal Facilities Strategy through the U.S. mail on Tuesday, May 9.

Please let me know if you need any further information.

Linda Nixon
(909) 765-3880

RECEIVED
MAY 09 2000

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

Santa Ana NPDES Municipal Storm Water Permit Renewal

Permittee Information Narrative CITY OF HEMET

Format, clarity, utility (or deficiencies) with the existing SAR DAMP

The existing SAR DAMP document was well organized and provided a very useful guide for the City of Hemet for the development of our own municipal drainage area management program. Model ordinances developed by the NPDES Advisory Committee to prohibit and enforce against improper disposal of pollutants to the storm drain system have been adopted into the Hemet Municipal Code.

Existing program organization / management structure

The current City of Hemet Drainage Area Management Plan and Municipal Facilities Strategy (both of which are attached to this narrative) were developed using the guidelines provided by the SAR DAMP. Regular meetings of the NPDES Santa Ana/Santa Margarita Advisory Committee have benefited the city by providing updated information on new regulations for Permittees, announcements of training opportunities, new storm water pollution prevention information, summaries of ongoing public education activities, and presentations by personnel from other agencies (such as the EPA) with Storm water management responsibilities and vendors offering a variety of water pollution-control products.

Utility of the current area-wide BMP programs

Public Education

The County of Riverside has developed a comprehensive public education program to promote storm water pollution control. City of Hemet residents have benefitted from this program through which they have received Storm water information via school programs, outreach events, organized storm drain stenciling events, distribution of materials to local libraries and at fairs / festivals throughout the County, media advertising, and a toll-free number providing information about the Storm Water / Clean Water Protection Program.

Santa Ana NPDES Municipal Storm Water Permit Renewal

**Permittee Information Narrative
CITY OF HEMET****Household Hazardous Waste Collection**

The Riverside County Health Services Agency / Department of Environmental Health provides two (2) mobile HHW collection events annually in the City of Hemet. There is a need to provide additional collection events in Hemet as evidenced by the inquiries received from City residents regarding the proper disposal of HHW. In order to address this issue, the City of Hemet recently submitted a grant proposal to the California Integrated Waste Management Board to provide four (4) additional one day mobile HHW collection events. This proposal was funded, and we are currently working with personnel from the Environmental Health Department to schedule these additional events.

Hazardous Materials Emergency Response

Although the Riverside County Environmental Health Department is the responsible agency for environmental spills in Hemet, the City of Hemet Fire Department has a Level B HAZMAT team fully prepared to contain runoff and neutralize acids or bases. The City HAZMAT team responds to emergencies and then transfers responsibility to the County for clean-up and disposal.

Commercial / Industrial Compliance Assistance Program

Lack of development activity during the period covered by the current NPDES permit has precluded the City of Hemet from taking advantage of this area-wide program. However, with commercial development now beginning to increase, this program would be of great assistance to City personnel.

Utility of current Storm water monitoring program

We do not have sufficient information to comment at this time.

Structure and format of annual reporting program

The Santa Ana NPDES Municipal Storm water Permit annual report is a very comprehensive document which requires a great deal of staff time to prepare

Santa Ana NPDES Municipal Storm Water Permit Renewal

Permittee Information Narrative CITY OF HEMET

and submit. While we understand the need for Permittees to submit this valuable information, any efforts to streamline the format would be greatly appreciated.

With the large amount of information which must be gathered, compiled and summarized for the annual report, more time is needed to prepare this document. Permittees received the final reporting forms only three weeks before the 1999 annual report was due. Expanding the report preparation time to a six week period would certainly help facilitate requests for information from other city departments (fire, community development, police, etc.), and timely submission of a thorough report.

Other topics concerning the municipal storm water management program

The current NPDES permit process shifts program implementation and enforcement responsibilities to local agencies for what is essentially a state and Federal mandate. This has created an unfunded mandate for municipal government agencies. A significant amount of staff time is involved in NPDES program implementation, monitoring and reporting. Adding the cost of ongoing training and the need to develop and implement programs to address new regulations, the expense associated with the NPDES program expands accordingly. Unfortunately the City of Hemet receives no designated funding to cover these expenses.

Considering the constraints of using staff and funding also devoted to other programs, the City of Hemet has a variety of concerns related to the new Storm Water Phase II Rule. Some of the new guidelines and BMPs will be difficult and expensive to implement, such as the installation of oil/grease filters in retention basins, with questionable benefit due to the inordinate amount of needed maintenance. In addition, the new rule will require an expanded need for the training of field personnel in the areas of reporting illegal dumping, sewer discharges, etc.

The City of Hemet looks forward to continuing to work with the Riverside County Flood Control and Water Conservation District and other Permittees to

Santa Ana NPDES Municipal Storm Water Permit Renewal

Permittee Information Narrative CITY OF HEMET

evaluate the current storm water management program and to suggest improvements and changes to the program now being developed. Few things are more important than our joint effort to preserve, protect and improve our water resources.



City of Lake Elsinore

"Home of the Diamond Stadium"

May 3, 2000

Riverside County
Flood Control and Water Conservation District
1995 Market Street
Riverside, CA 92501
Attn. David Zappe

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MAY - 4 2000

BY: _____

Subject: NPDES Municipal Storm Water Permit Renewal, General Information.

Dear Mr. Zappie:

In response to your letter dated April 19, 2000, the City of Lake Elsinore respectfully submits the following information:

Request for permittee information:

Being new to the NPDES program, it is difficult for me to intelligently comment on most of these issues. From my exposure to the Santa Ana Region Drainage Area Management Plan (SAR DAMP), although overwhelming in size and content, it has clarity and a functional format. The management structure for this program seems to work very well with the County in the lead and the permittees meeting once a month to stay up to date on the permit information and related activities. Getting information to the public is an important part of this program's success. From my conversations with the City's household hazardous waste program coordinator, the outreach the City has been involved with; including public education, informational brochures etc. seems to be very effective in the this area.

Monitoring discharge in Lake Elsinore is completed by our public works staff as well as the engineering inspector. The annual reporting program requires Staff to keep track of the monitoring progress and the two work well hand in hand.

The one issue I am most concerned with, especially being new to the program, is where to start. I have had difficulty finding the direction I need to take to be an effective NPDES coordinator. There is a perpetual feeling that I'm missing or forgetting to do something.

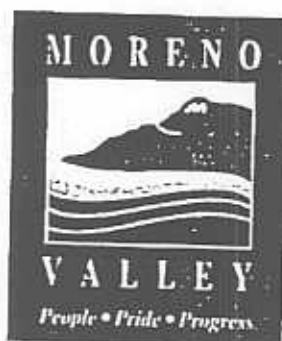
Please find enclosed a copy of the City's land use map and a map showing the City's current inventory of storm water infrastructure. If you have any questions or need further information, please contact Ken Seumalo at X243.

Sincerely,
City of Lake Elsinore

A handwritten signature in dark ink, appearing to read "Ken Seumalo", written in a cursive style.

Ken Seumalo
Associate Civil Engineer

Enclosures



Public Works Department
Land Development

City Hall
14177 Frederick Street
P.O. Box 88005
Moreno Valley, CA 92552-0805
Telephone: (909) 413-3120
FAX: (909) 413-3210

May 4, 2000

Mr. Mark Wills, Senior Engineer
Riverside County Flood Control and
Water Conservation District
1995 Market Street
Riverside, CA 92501

**SUBJECT: SANTA ANA NPDES MUNICIPAL STORMWATER PERMIT
RENEWAL**

Dear Mark:

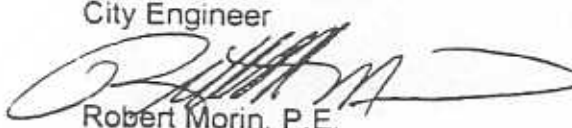
The City is in receipt of a letter dated April 19, 2000 from the Flood Control District. The District has requested the City of Moreno Valley to provide a brief narrative regarding various issues related the current NPDES program. Additionally, the City is requested to provide any internal documents related to implementation of SAR DAMP BMPs.

Attached is the requested narrative. Additionally, a number of documents are attached regarding the City's implementation of certain SAR DAMP BMPs.

If you have any questions or require additional information please call Kent Wegelin at 909.413.3115.

Sincerely,

Trent D. Pulliam, P.E.
Public Works Director/
City Engineer



Robert Morin, P.E.
Senior Engineer

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Attachments

c: Kent Wegelin, Associate Engineer

**Attachment A
City of Moreno Valley
Narrative**

- *Format, clarity, utility (or deficiencies) with the existing SAR DAMP (dated February 1993).*

The format and clarity of the existing SAR DAMP is acceptable. The City of Moreno Valley has three areas of concern regarding the SAR DAMP.

The first area is related to Section 1.4.6—Roles and Responsibilities of the SAR DAMP. It is suggested that a list of the co-permittees along with a list of members of the various committees and newly required responsibilities of permittees and committees be included. If appropriate, reference or provide implementing authority for creating various committees. Include language as to whether or not meetings convened by the authorized committees to implement requirements of the NPDES Permit or the SAR DAMP are open or closed to the public.

The second area is related to the reconnaissance survey required in Section 1.4.6. It is unclear how often a reconnaissance survey is required. Due to the expense of this type of survey (especially for underground systems) the reconnaissance survey should be performed only once. There are methods available to the co-permittees to monitor connections to their existing drainage systems that should eliminate the need for additional reconnaissance surveys.

The third area is Section 6.2.3--Evaluation Schedule. The tables provided in this section might be redundant with the annual reporting forms. The City has not used these tables for reporting.

- *Existing program organization/management structure;*

The organization and structure are acceptable.

- *Utility of current area-wide BMP programs (i.e. Public Education, Household Hazardous Waste Collection, Hazardous Materials response, Commercial/Industrial Compliance Assistance Program);*

Public Education is very useful. The City receives positive feedback from this BMP. Household Hazardous Waste Collection is also useful. If funding allows the City would encourage an additional HHW event at the City's Corporate Yard for the fall or spring in future years.

- *Utility of current stormwater monitoring program;*

No comment.

- *Structure and format of annual reporting program;*

The structure and format are acceptable. Use of the electronic forms made the process easier last year.

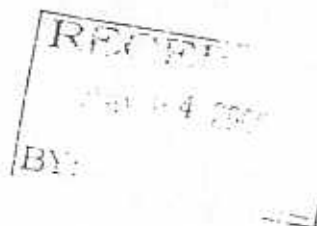
- *Other topics, etc.*

No comment



CITY of NORCO

CITY HALL 2870 CLARK AVENUE (909) 738-3900, FAX (909) 270-5622 P.O. BOX 428, NORCO, CA 92860-0428



May 4, 2000

Riverside County Flood Control
And Water Conservation District
1995 Market Street
Riverside, CA 92501

Dear Mr. Wills,

The City of Norco appreciates this opportunity to offer a brief narrative of our suggestions and concerns relating to the re-issuance of the NPDES Permit. Norco, being a small municipality with limited resources and staffing, feels very fortunate to be a co-Permittee with the County. The Counties expertise and experience has assisted us in understanding and implementing the many facets of the existing permit.

Although time consuming, the current programs, format, and reporting is being completed. However, much of the information generated is redundant, of little use to the City and remains unchanged year to year. It is difficult to obtain, quantify and isolate information that is specific to the program as multi-tasked staff accomplishes many of the activities.

We support education programs as the most effective method of compliance with the intent of the permit. We would suggest that numerical limits are difficult to justify. Considering the lack of flow throughout much of the year, accurate timing and collection remain a problem. The influence of exempted or natural pollutants as well as pollution from agricultural uses renders numerical limits impractical. The cost to treat all storm waters is a financial hardship with little measurable gain to the area.

We believe that a regional permit would be effective. It is neither realistic nor practical to isolate individual jurisdictions using the same drainage system. Additionally, a regional

CITY COUNCIL

FRANK HALL
Mayor

HAL M. CLARK
Mayor Pro Tem

BARBARA J. CARMICHAEL
Council Member

HERB HIGGINS
Council Member

HARVEY C. SULLIVAN
Council Member

approach to enforcement by a single agency with citation powers should be encouraged. Local agencies would advise, report, and provide BMP's along with other educational materials to insure compliance with the permit. However, enforcement, perhaps at the State level, would insure uniformity as well as recognize past violators and/or practices.

If you have any questions or require additional information feel free to contact me at (909) 270-5618.

Respectfully,

A handwritten signature in cursive script that reads "Jeffrey Peterson".

Jeffrey Peterson,
Civil Engineering Assistant



CITY OF PERRIS

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
101 N. "D" Street, Perris, CA 92570-2200
TEL: (909) 943-5003 FAX: (909) 943-3293

April 27, 2000

Mark H. Wills, Senior Civil Engineer
Riverside County Flood Control and
Water Conservation District
1995 Market Street
Riverside, CA 92501


Subject: Storm Water Permit Renewal

Dear Mr. Wills:

Enclosed please find the draft Storm Water Management Plan for the City of Perris. The plan will be submitted for approval to the Board on April 28, 2000. Also enclosed are maps and lists indicating locations of known storm water facilities in the City of Perris. Please note that the maps and lists are not current, and the City plans to research approved maps to locate additional facilities. Per your request I have also enclosed a current zoning map, which is used to implement the City's General Plan land use designations.

For specific information regarding storm drain facilities please contact the City Engineer's Office at 943-6504. If you require any additional information, please do not hesitate to contact me at (909) 943-5003 x226.

Sincerely,


Michael A. Morales
Associate Planner



Development
Services

CITY OF SAN JACINTO

Post-It® Fax Note 7671		Date 5/4	# of pages 2
To Mark Wills		From Tim Hults	
Co./Dept. REFC WCD		Co. City of San Jacinto	
Phone #		Phone # 487 7330	
Fax # 788 9965		Fax #	

May 4, 2000

Mr. Mark Wills
Senior Civil Engineer
Riverside County Flood Control
and Water Conservation District
1995 Market Street
Riverside, CA 92501

RECEIVED
MAY 04 2000

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

Subject: Stormwater Permit Renewal

Dear Mark:

With regard to the existing SAR DAMP, revisions may be appropriate upon the modification of the City of San Jacinto Master Drainage Plan and the construction of a permanent levee along the south side of the San Jacinto River. As the City of San Jacinto begins the process to comprehensively update its General Plan, one of the components of the update will be an analysis of the City of San Jacinto Master Drainage Plan. Additionally, the City of San Jacinto has Webb and Associates under contract to conduct a flood study of the area near the San Jacinto River in the City. The flood study will be used to determine potential damage from various flood events, which will be the basis for the Corps. of Engineers in the analysis for the need to construct a permanent levee on the San Jacinto River.

The Community Development Department and the Public Works Department are responsible for implementation of the City of San Jacinto specific provisions of the SAR DAMP and for the implementation of the NPDES Permit. The Planning Director and the City Engineer provide the management and over sight of the field personnel involved in inspection and enforcement of development projects. Additionally, the City Engineer reviews the applicable storm water pollution prevention plans and provides construction project inspection. Furthermore, the City Engineer is responsible for coordination of regional flood control facilities with the Riverside County Flood Control District.

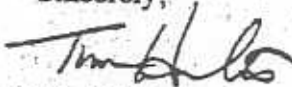
Mr. Mark Wills
May 4, 2000

The Community Development Department personnel, including the building inspectors and code enforcement officer, provide enforcement of new development on-site controls, construction on-site compliance controls and illicit discharge control. The Planning Department maintains any records related to the stormwater-monitoring program.

Presently, due to the significant amount of open space and the limited amount of stormwater facilities in the City, the relatively small staff can keep up with the program. However, as the City develops and additional facilities are constructed, the ability of the staff to monitor the program will be taxed. Furthermore, the current fee and tax structure available to municipal governments does not provide adequate funding opportunities to increase local staff to keep up with state and federal mandates. Additionally, while training opportunities are welcome, it is difficult for a small agency to free a staff member to attend a seminar or conference that is located out of the area. Additional training sessions or BMP demonstrations in the area would provide greater opportunities for smaller agencies to participate.

I appreciate the opportunity to comment of the Santa Ana NPDES Municipal Stormwater Permit Renewal. If you have any questions or need additional information, please give me a call.

Sincerely,



Tim Hults
Planning Director